

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Chilton School District

Agency Code: 8-1085

School Reviewed: Chilton Elementary School

Review Date(s): February 6-8, 2017

Date of Exit Conference: February 8, 2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Chilton School District for the courtesies extended to me during the on-site review. Thank you for being available to answer questions and for providing additional information. All were very receptive to recommendations and guidance offered. In addition, thank you for taking the time to respond to the off-site questions and requests for the nutrition program consultant and the public health nutritionist, as well as pulling records for the on-site portion of the review.

Some of the individuals with school nutrition duties are fairly new in the district and learning the tasks. They have done a great job and were very open to suggestions to understand the programs in more depth. The director has named a lead in each cafeteria who orchestrates purchasing, production and food service in that site.

The Chilton School District school nutrition director works to obtain local foods to use in the meal programs. They currently use local beef, apples and some vegetables through Farm-to-School efforts. The staff in the school nutrition department are offered many training opportunities to enhance their ability to perform duties, including ServSafe food safety class, local and state School Nutrition Association (SNA) and Department of Public Instruction (DPI) meetings and conferences.

A wonderful resource is provided to all households annually and when new families enroll in the district – the school year calendar. This includes many of the school nutrition references and promotes those programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Thank you for administering the 30 operating day carry over of meal benefits from the previous year until a new determination is made.
- Applications are reviewed in a timely manner. An eligibility determination is made, the family notified of its status, and the eligibility implemented within 10 operating days of the receipt of the application. The Determining Official dates and signs the application when determined. There is a flexibility allowed to hold applications to be determined at a later date; this applies only to complete applications containing all required information and for all applications. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Please contact the Assistant Director of the School Nutrition Team for more information and approval.
- The Determining Official created a tool to calculate the household income total when she enters the individual frequency and amounts. Please be reminded to only annualize household incomes when there are different frequencies.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the correctly determined benefits.
- Thank you for following up with the household when the household size box was not correct or not completed, or when the least 4 digits of the social security number or adult signature was not completed. The SFA is required to follow up with the household to confirm the total number of household members or receive the missing information. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included which may make a difference in the eligibility determination. Any application that does not have this box completed is considered an incomplete application.

- The district personnel collaborate with English as Second Language staff to communicate with Limited English Proficiency (LEP) families. Appropriate documentation is kept for each transaction. This is great! Application materials are offered in other languages, as needed.
- Thank you for running direct certification the minimum of three times a year, plus more to capture new students and students with eligibility changes.
- You work with school officials to identify Other Source Categorical Eligibility, such as homeless, migrant, or runaway status. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Thank you for using the DPI prototype letters with the current non-discrimination statement and sending letters to all households which submit an application.
- When applications are chosen for verification, the person designated as the Confirming Official reviewed these applications prior to contacting the family, then signed and dated the back of the application. The Verifying Official signs and dates the application when the verification process is completed.
- Thank you for using the Verification Tracker form to keep notes throughout the process.
- Your manual POS back-up system gives a good process should the electronic system fail.
- Meals are offered to all students each day school is in session a full day, including for field trips. Please note that DPI has a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>
- The meal counting and claim was correct.

Comments/Compliance Reminders

Certification and Benefit Issuance

- On hundred and ninety-four eligibility determinations were reviewed, with zero errors identified.
- Two additional students were identified as receiving appropriate benefits and not on the list provided. Please maintain a complete and current Benefit Issuance list created from the point of service (Meals Plus) software.

Applications

- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>) you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss.

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- LEAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian.
- The FNS website offers the application materials in 49 languages
<http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

Annual Income

- If the household provided only annual income, the LEA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income.

Other Source Categorical

- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Application Forms

- If an SFA wishes to change the look or format of the application for free or reduced price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.

Transferring Students

- When a child transfers to a new school within the same LEA, the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification

- The effective eligibility date for a DC eligible student is the date of the original output file.
- When applicants are found on the DC runs, please move the paper application into a separate folder so they are not counted in the sample size for the Verification process.

Disclosure

- The information provided by the household on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic participation or testing fee waivers. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.

Verification

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility status decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with the appeal rights procedures.

Meal Counting and Claiming

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Technical Assistance

- If a household submits an application after the original, please keep them both together in the new determination status folder.
- An application is considered “error-prone” if the income is figured to be within \$100 per month or \$1200 per year of the upper limits of the Income Eligibility Guidelines for free and reduced categories.
- The Sharing Information with Other Program form <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc> is used for 2 fee waivers at the high school level. If the SFA exercises the option to provide the opportunity to waive or subsidize other district fees (e.g., registration, athletic fees, technology fees, etc.) based on a student’s free or reduced price meal benefit status, the SFA **must** provide the *Sharing Information with Other Programs* form to all recipients as determined through an application **as well as** Direct Certification. SFAs must allow households to limit consent to only those programs they wish to share information. SFAs are not allowed to have a blanket fee waiver. Additional benefits outside of the meal benefit cannot be provided until a signed form is returned to the SFA allowing the information to be shared.
 - Consider providing the *Sharing Information with Other Programs* form for families of preschool (4K) students to receive milk at no charge for households eligible for free or reduced price meals. You may need to provide the Alternate Application in English <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/alternate-household-income->

[form.docx](#) and Spanish <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/alternate-household-income-form-spanish.docx>.

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.
- The Confirming Official needs to ensure the initial determination of the applications selected for verification process is correct.
- The Confirming Official must not review each application submitted. Per the Eligibility Manual, page 80: *Establishing the Sample Size*
 - Once the sample pool is determined, the LEA calculates the sample size, which is the number of applications that must be verified. When calculating the sample size, all fractions or decimals are rounded upward to the nearest whole number. At least one application must always be verified.
 - With the exception of verification for cause, LEAs must not verify more or less than the standard sample size or the alternate sample size (when used), and must not verify all (100%) of the applications. Verification conducted “for cause,” as described in the following section, is done in addition to the required verification sample size.
- During the verification process, if the household does not respond in the required time frame, please reach out to them in writing and by phone to get the best response.

Findings and Corrective Action Needed

Certification and Benefit Issuance

- ❑ **Finding #1:** The Confirming Official signed every application which was submitted. That is not required or acceptable. The Confirming Official’s duty begins at the beginning of the verification process after the Verifying Official completes the sampling size and selects the required number of applications to verify. Then the Confirming Official reviews the application(s) for completeness and accuracy per the current Eligibility Manual and passes it back to the Verifying Official to take through the rest of the process.

Corrective Action Needed: Please submit a statement of how this process will be completed in the following years of the verification process.

Verification

- ❑ **Finding #2:** The Verification process was completed for four applications, when the correct number should have been two according to the Sampling Size worksheets, specifically the Alternate 1 Sample Size worksheet, as found in this packet of verification information <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>. It is not acceptable to verify more applications than required, except for “verifying for cause.” It also appeared that the Determining Official was the person completing this duty when it should have been the Verifying Official. Note: the same person may complete the Determining Official and Verifying Official duties.

Corrective Action Needed: Please submit a statement of who (position title) will complete the verification sampling size selection process using the provided documents in the following years. This needs to be your indicated Verifying Official.

Meal Counting and Claiming

- ❑ **Finding #3:** Before entering the claim, it is necessary to complete an edit check, called Accuclaim/Edit Check in your Meals Plus electronic system. This is to ensure the daily counts do not exceed the eligible limits of Free/Reduced and Paid students at each site before you calculate your reimbursable meals by site before consolidating for the monthly claim.

Corrective Action Needed: Please submit the Accuclaim/Edit Check for the month of February and a statement of how this will be completed in the future by the person's position.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

(From the Public Health Nutritionist)

Commendations:

Thank you to the Food Service Director at Chilton School District for sending all documentation ahead of time in an organized manner. Minimal errors were found during the administrative review, and the meal pattern is being followed very well. Great job at filling out the weighted nutrient analyses, which prove you are remaining within the appropriate dietary specifications.

Technical Assistance:

Standardized Recipes: Make sure the crediting on standardized recipes is accurate and the products currently being used are up-to-date. The Ham and Cheese Sandwich recipe had a crediting of 2 oz. eq. M/MA, however the correct crediting was 2.25 oz. eq. M/MA. The Grilled Ham and Cheese Sandwich recipe included product information that was no longer in use. It is important that recipes are being updated, if necessary, to reflect current practices and checked for accuracy. More information can be found on [DPI Recipe Resources and Tools](#).

Findings and Corrective Action Needed:

Finding #1: Processed products require a current Child Nutrition (CN) label or a detailed Product Formulation Statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number, weights of raw and cooked ingredients, portion size, statement of contribution to meal pattern requirements, and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead, and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS, it may not be credited when served as part of USDA's Child Nutrition Programs. The PFS provided for the Egg Omelet Cheese Cheddar 6" Frozen did not include an entry from the Food Buying Guide (FBG) or a FBG Yield, resulting in an invalid PFS. A PFS template for Meat/Meat Alternate can be found: [M/MA PFS Template](#).

Corrective Action Needed: Please provide a correct PFS for the Egg Omelet, which includes the missing information.

Finding #2: The Department of Public Instruction has come up with a list of production record requirements. All items on this list must be included on production records and documented daily. Currently, the production records in use do not contain the serving size and the quantity purchase units prepared. Additionally, the grade groupings of 1-8 is listed under serving size, which is unclear

and should be moved to a different location. More information and [Sample Templates](#) can be found on the DPI School Nutrition website.

Corrective Action Needed: Please submit a week's worth of updated, completed breakfast production records with the added information (serving site, grade grouping, and quantity purchase units prepared). **COMPLETED 2-8-2017**

(From the Nutrition Program Consultant – onsite)

Commendations:

- Cashiers are trained on the required meal components and the Offer Vs. Serve concept.
- The serving lines are attractive with pans of hot food, replenished often and extra tongs kept in pans above the serving line to use as needed.
- The Elementary cafeteria servers meet before serving time to review the meal pattern and serving instructions. The staff are dressed in colorful uniforms and hairnets.
- The school nutrition department requires staff to complete a Serv Safe class.
- The food service workers prepare fresh vegetables and fruit. They clean, peel and slice vegetables to place on the fruit and vegetable buffet. There is a canned and fresh fruit each day.
- There is a cold sandwich choice each lunch period for an alternate entrée choice.
- The large sign for lunch choices includes pictures for the younger students to identify what is on the daily menu and constitutes a reimbursable meal.

Comments/Technical Assistance/Compliance Reminders

- The current menu for Breakfast and Lunch are posted by the entrance to the serving line which includes language about the requirement to select at least ½ cup fruit or vegetable for a reimbursable meal. The large colorful sign does not have this statement. Please add this to reinforce the requirement.
- The Middle School grade group has low participation in the breakfast program. It is recommended to offer a time period for this population to access the breakfast meal, perhaps before school hours, as breakfast is such an important meal for academic performance.

3. RESOURCE MANAGEMENT

Commendations

- The Business Manager has great knowledge of the coding and placement of the accounts payable and receivable for the nonprofit food service account, Fund 50.
- The school nutrition director and the business manager collaboratively work on the annual financial report entries and the nonprogram foods revenue tool. The USDA nonprogram foods revenue tool completion is required annually.
- Great job running the Paid Lunch Equity tool each year and adhering to the pricing requirements. The current weighted average for 2016-17 SY tool is \$2.65; USDA's target price is \$2.78, therefor requiring an increase in the weighted average lunch price.
- Thank you for having a process in place to transfer money from the General Fund to the Food Service Fund when the District determines a negative family balance is bad debt and not to be collected.

Comments/Compliance Reminders

Nonprofit School Food Service Account

- The SFA's Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA's account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.

Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance on June 30 can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.

Allowable Costs

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

Paid Lunch Equity

- The Paid Lunch Equity (PLE) tool must be completed yearly and prices raised accordingly with a maximum yearly increase of \$0.10 as required by regulation. The LEA may choose to seek an exemption to raising lunch prices according to the PLE in an effort to reduce the fund balance.

Revenue from Non-program Foods

- **Non-program Foods Revenue Rule SP-20-2016**
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
 - Non-program Foods "In a Nutshell" <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
 - Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), and Catered Meals.
 - All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Non-program foods must be separated from program food costs, but may not be supported by those reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program

foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) may be used to determine 2017-18 SY prices since rates aren't released until July 1 of each year. Your adult meal price for lunch is more than required so could be held for the coming school year. The adult breakfast price is correct unless you raise the student price.

To document non-program food compliance with the Federal regulation, the USDA Non-program Foods Revenue Tool needs to be completed. To do this, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. This includes an itemization of all non-program foods to be offered during the reference period, the per item/serving cost of each non-program food, including food sold only as non-program food, food sold as program and non-program food (crossover food); and the number of servings/items sold. SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Non-program Foods Revenue Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

Technical Assistance

- SFAs must limit the net cash resources in order to not exceed three months average expenditures. The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". The School District of Chilton has been working to reduce their excess cash balance through updating kitchen equipment.
- The Annual Financial Report is revised in more detail for this 2016-17 school year. You may find this summary "In a Nutshell" helpful: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx>, as well as the instructions to complete the report: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc> and the new webcast training: <http://dpi.wi.gov/school-nutrition/training/webcasts#afr>.
- Other possible expenditures may include money for staff training at conferences and meetings travel, nonslip shoes or uniforms, small wares like lunch trays or milk refrigeration units, etc.
- The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The DPI Non-program Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>. I highly recommend inserting your program and nonprogram food costs and revenues into this calculator to see how your operations are performing.

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges, by July 1, 2017. For a snap-shot on what the policy must include, see the Unpaid Meal Charges “In a Nutshell” at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>, including:
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

- Chilton School District offers meal benefit forms in languages besides English depending on the needs of their population.
- Students with special dietary needs are accommodated with meal item substitutes, when feasible and provided a special meal per licensed medical practitioner statements.
- A complete civil rights training was offered in September, 2016 and had been attended by all staff in the schools, with documentation available for review.
- It was wonderful to see the food safety inspection report and the new “And Justice for All” posters posted in the cafeteria so the public can read the information.
- Food substitutions for children with disabilities were documented by a licensed medical practitioner. We have a prototype Medical Form <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special-dietary-requests-form.pdf> posted on our website that is also available in Spanish and Hmong that you can use. When the form is completed indicating that the special dietary request is based on a disability, the school is required to provide a meal that meets the child’s needs as documented. The meal would not have to meet the meal pattern requirements, as the diet request serves as the meal pattern for that particular child. Additional information on Special Dietary Needs can be found on the DPI School Nutrition Team website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- The Elementary School does not offer any fundraisers during the school day and does not sell foods to students, so meet the Smart Snack regulations.
- Water was accessible to students at the Elementary School during meal periods.
- All pieces of cooling equipment and the dish washing equipment have the internal temperature taken and recorded daily on a temperature log.
- The Food Safety Plan contains required sections and is demonstrated through the employees engaged in their work duties. Hairnets, gloves and food temperature taking were observed. There is a Standard Operating Procedure for handling Allergens.
- All food service employees must have a signed Employee Reporting Agreement on file.
- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). The on-site storage areas, including freezers, refrigerators, and dry good storage rooms were reviewed and found in compliance.

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- The school nutrition director is tracking all staff with school nutrition duties per the Professional Standards regulations. Please include the Key Areas for the training topics obtained. This link provides suggested continuing education topics: <https://dpi.wi.gov/school-nutrition/training> and some updated webcasts. Some typical trainings for those staff outside of school nutrition may include time spent reviewing the current Eligibility Manual, Online Contract Manual, Claims Manual and the required Civil Rights training.
- Local beef, apples and vegetables are sought for purchase to use in the school nutrition programs. Thank you for your Farm-to-School efforts and attempting to purchase locally.
- Thank you for promoting the school Breakfast Program in your back-to-school calendar and on monthly menus to households. Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our website: <https://www.youtube.com/watch?v=aHR7eECbKaE>

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Special Dietary Needs

- When a school is accommodating meal substitutions, they must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by-case basis and all accommodations must be made according to the USDA's meal pattern requirements in order to claim the meal.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals (i.e., \$2.50, .40, 0.00) are visible on the computer screen but not able to be seen by students, which would be overt identification. Please check with your software company to see if that setting can be changed.

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) for receiving and processing any complaints alleging discrimination within the National School Lunch Program and School Breakfast Program. An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.

On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the SFA onsite monitoring section.

Local Wellness Policy Summary for Administrative Review

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 with **full compliance of the requirements of the final rule by June 30, 2017.**

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and the process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment results available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.pdf>. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school->

[wellness-resources](http://dpi.wi.gov/school-nutrition/wellness-policy). Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff	Part Time Staff
		(20 hrs or more/week)	(less than 20 hrs/week)
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers

and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

Summer Food Service Program (SFSP) Outreach

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Chilton School District, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the summer meals locator on the DPI Summer Meals website
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website
<http://www.fns.usda.gov/summerfoodrocks>.

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
e-mail: amy.kolano@dpi.wi.gov

- ❑ **Finding #4:** The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program (SBP) beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

Corrective Action Needed: Please submit the Breakfast Onsite Monitoring form when completed for one of your Breakfast sites.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

